

Exhibit B

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Friday, May 2, 2025 6:15 PM
To: Ashley Bolt
Cc: Sara Fish; rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater; pkroeger@raklaw.com
Subject: RE: Headwater v. Samsung, 2:23-cv-641: ESI for Samsung custodians

Ashley, Sara, Tae,

Thanks for joining the call earlier this morning.

During the call, we discussed upcoming source code review and that the review machine did not include source code for Samsung S23 and earlier devices. You were in the process of ensuring that S23 and earlier code would also be available for inspection next week. Can you confirm that that will be available for inspection on Monday?

We also discussed a representative product stipulation that would help to streamline source code review and discovery. Please let us know Samsung's thoughts on that after you have a chance to discuss with your team.

With respect to ESI, we discussed that because both parties have access to emails produced in previous cases under the cross-use agreement, and that Samsung still seeks ESI from Sippl, the parties can streamline ESI discovery here to only one custodian per side. To that end, Headwater can agree to review/produce Sippl ESI provided Samsung agrees to review/produce ESI for Ellen Canfield, and both parties will forego any other ESI discovery as to other custodians.

To that end, please find modified search terms for the terms we understand are still objected to. Please let us know if Samsung agrees to the above proposal and to the below terms.

- carrier w/25 require*
 - Modified term: sprint w/25 require*
- (Google or android) and (skylight or gms or "google mobile services" or mada or rsa or certified or partner or bug or problem)
 - Modified term: (Google or android) w/15 (skylight or gms or "google mobile services" or mada or rsa or certified or partner or bug or problem)
- durig and (Koh or (Henry w/3 lee) or kanchiraju or Saha or yunsang or hongshik or hongjung)
 - Modified term: durigw/15 (Koh or (Henry w/3 lee) or kanchiraju or Saha or yunsang or hongshik or hongjung)

Dr. Raleigh is available for deposition in Los Angeles at Russ, August & Kabat on May 14. You asked if he could be available the week of May 19th instead. While he isn't available on the 19th and 20th, we are checking on the 21st through the 23rd, and will let you know shortly.

We also discussed my recent letter identifying some deficiencies in Samsung's production and interrogatory responses. You indicated that you didn't think that it would be an issue to supplement and produce additional material in advance of Ansik Shin's and Seungseok Hong's depositions, but please let us know if Samsung won't be able to supplement sufficiently in advance of those depositions.

We also discussed a possible extension to the schedule to give the parties some additional time to complete fact discovery. We're in the process of putting together a proposal and will send that to you shortly.

Finally, as we discussed on the call, please let us know if Samsung is amenable to streamlining the case with respect to the 811 patent in a similar fashion to how the parties streamlined the 103 case with the 192 patent.

Thanks,

Jason Wietholter
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025
Main +1 310 826 7474 | jwietholter@raklaw.com | www.raklaw.com